

REMARKS

Claims 1, 8-14, 17, 18, 23-27, 30-32, 39-42, 45, 46, 51-55, 58-60, 67-70, 73, 74, 79-83, and 86-139 are pending, with claims 1, 32, 60, 88, 105, and 120 being independent.

Claims 126 and 128 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants have amended claim 126 to depend from claim 125 and have amended claim 128 to depend from claim 127, as suggested by the Examiner. As such, Applicants respectfully request withdrawal of the rejection of claims 126 and 128.

Claims 1, 8-14, 23-27, 30-32, 39-42, 51-55, 58-60, 67-70, 79-83, 86-94, 97-111, 114-126, and 129-139 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Krishnan (6,075,863) in view of Onosaka (5,961,608). Dependent claims 17, 18, 45, 46, 73, 74, 95, 96, 112, 113, 127, and 128 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Krishnan in view of Onosaka and further in view of Coutts (6,311,165). Applicants respectfully traverse these rejections.

This response first addresses the rejection with respect to independent claims 1, 32, and 60 and their respective dependent claims, and then with respect to independent claims 88, 105, and 120 and their respective dependent claims. Finally, the response addresses the rejection of dependent claims 17, 18, 45, 46, 73, 74, 95, 96, 112, 113, 127, and 128.

Claims 1, 8-14, 23-27, 30-32, 39-42, 51-55, 58-60, 67-70, 79-83, 86, and 87

Independent claims 1, 32, and 60 recite a system (claim 1), a method (claim 32) and a computer program (claim 60) for installing computer software components on a client device for enabling connectivity to a host system by at least one of several different hardware devices that includes, among other features, detecting a new hardware device and, based on detecting the new hardware device, determining whether a connectivity component is stored locally that is needed to enable the connectivity between the client device and the host system using the new hardware device. If the connectivity component that is needed is not stored locally on the client device,

then an updated connectivity component is received from a remote server to enable connectivity between the client device and the host system using the new hardware device.

Applicants request reconsideration and withdrawal of the rejection because Krishnan and Onosaka, either alone or in combination, fail to describe or suggest these features. Specifically, neither Krishnan nor Onosaka describes or suggests detecting a new hardware device and, based on detecting the new hardware device, determining whether an updated connectivity component is stored locally, and receiving an updated connectivity component from a remote server when the updated connectivity component is not stored locally, as recited in claims 1, 32, and 60.

Instead, as relied upon on page 14 of the Final Office Action, Krishnan describes using a data encryption applet between two modems. If the modems contain the same applet version, then a data transfer occurs. If the modems do not contain the same applet version, then the modems may negotiate to transfer the new applet version among the modems.

"Loading an applet from a remote modem provides a facility for automatic data encryption services. For example, any time a connection is established between a modem 10 and a similar remote modem, the use of a data encryption applet may be negotiated. If the modems already contain the same version of the encryption applet then data transfers may begin. If, however, one of the modems lacks the encryption applet, or has an older, out-of-date version, the modems may negotiate to transfer the new version." See Krishnan, col. 4, line 62 to col. 5, line 3.

Nowhere does this relied upon section of Krishnan, nor any other part of Krishnan, describe or suggest receiving an updated connectivity component from a remote server, when the connectivity that is needed is not detected on the client device, based upon detecting a new hardware device. In Krishnan, the transfer of a new applet version is triggered by one of the modems having an old version, and not by the detection of a new hardware device.

Even assuming for the sake of argument that the teachings of Krishnan and Onosaka may be combined together, the combination of the two references still does not describe or suggest the recited nexus of receiving an updated connectivity component from a remote server when the updated connectivity component is not detected on the client device based on the detection of the new hardware device. Although Onosaka describes that new hardware devices may be detected,

Onosaka does not describe or suggest receiving an updated connectivity component from a remote server when the needed connectivity component is not detected on the client based on the detection of the new hardware device. Rather, Onosaka merely changes a pointer in the client to point to the currently selected modem driver.

"Based on the user's actions, the system software dynamically changes the pointers to the currently selected modem driver and/or the currently selected serial driver." See Onosaka, col. 4, lines 34-37.

Moreover, the Response to Arguments on page 14 of the Final Office Action makes it clear that the recited claim is not being considered as a whole, because only a portion of the Applicants' arguments has been considered. The Final Office Action mischaracterizes the recited claims and Applicants' arguments when it states:

"Applicant argued that the cited references do not teach downloading the connectivity component from the remote computer after detecting the component is not in the client (Remarks, first completed paragraph page 28)." See Final Office Action mailed August 24, 2004, page 14.

The Office Action's characterization of the claim and Applicants' arguments makes no mention that these events are triggered by the detection of a new hardware device. Here is what the first complete paragraph from page 28 of the Reply to the Office Action actually stated:

"Thus, Krishnan and Onosaka do not describe or suggest downloading a connectivity component from a remote computer in response to the automatic detection of a new hardware device, after determining that the connectivity component is not present on the client device, as recited in amended claims 1, 32, and 60." See Amendment in Reply to Action of January 16, 2004, filed May 17, 2004, page 28 (emphasis in original).

Thus, it is clear from the misstatement of the Applicants' arguments in the Final Office Action that all of the features of the recited claims are not being considered.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claims 1, 32, and 60, and their respective dependent claims.

Claims 88--94, 97-111, 114-126, and 129-139

Claims 88, 105, and 120 recite a system (claim 88), a method (claim 105), and a computer program (claim 120) for enabling connectivity to a host system by at least one of several different hardware devices that includes, among other features, receiving and copying multiple connectivity components from a compact disk that are stored in a dormant state on the client device. At least one of the connectivity components is installed when it is detected that the connectivity component is needed to enable connectivity between the client device and the host system using a selected hardware device.

Applicants request reconsideration and allowance of these claims because Krishnan and Onosaka, either alone or in combination, fail to describe or suggest copying multiple connectivity components from a compact disk and installing at least one of the connectivity components on the client device when it is needed to enable connectivity.

The Final Office Action relies upon Krishnan at col. 2, lines 56-57 to suggest receiving connectivity components from a disk. See, Final Office Action mailed August 24, 2004, page 15. However, this argument and reasoning are flawed for at least two reasons. First, the relied upon section of Krishnan describes ROM 22, which is a component of modem 10. ROM 22 is not a compact disk, but rather read only memory that is a fixed component of the modem 10. Second, ROM 22 does not store or provide any connectivity components to the client device. Rather, ROM 22 "includes programming for controlling overall operation of modem 10, and for executing applets stored in RAM 20." See Krishnan, col. 3, lines 3-6. Thus, it is clear that Krishnan does not describe or suggest receiving and copying multiple connectivity components from a compact disk, as recited in independent claims 88, 105, and 120.

Onosaka does not remedy this failure of Krishnan and, notably, is not relied upon by the Final Office Action to describe or suggest these features.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claims 88, 105, and 120, and their respective dependent claims.

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Claims 17, 18, 45, 46, 73, 74, 95, 96, 112, 113, 127, and 128

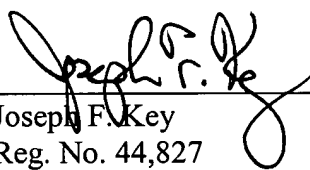
With respect to dependent claims 17, 18, 45, 46, 73, 74, 95, 96, 112, 113, 127, and 128, Applicants respectfully request reconsideration and withdrawal of the rejection because Krishnan, Onosaka, and Coutts, either alone or in combination, fail to describe or suggest the features discussed above with respect to the independent claims upon which these claims depend. Coutts does not remedy the failure of Krishnan and Onosaka to describe the features discussed above with respect to the independent claims and, notably, is not relied upon in the Final Office Action to support these features.

No fees are believed to be due. However, during prosecution of this application, please apply any deficiencies or credits to deposit account 06-1050.

Respectfully submitted,

Date: _____

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